

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE AMERICAN INTERNATIONAL GROUP,  
INC. 2008 SECURITIES LITIGATION

Master File No.:  
08-CV-4772-LTS-DCF

**ELECTRONICALLY FILED**

This Document Relates To: All Actions

**NOTICE OF LEAD PLAINTIFF'S**  
**MOTION FOR CLASS CERTIFICATION**

**PLEASE TAKE NOTICE** that upon the authorities and exhibits in the accompanying Memorandum of Law in Support of Lead Plaintiff's Motion for Class Certification and Declaration of Jeffrey W. Golan in Support of Lead Plaintiff's Motion for Class Certification, and the parties having met and conferred concerning the present matter, Lead Plaintiff, the State Treasurer of Michigan, as custodian of the Michigan Public School Employees' Retirement System, the State Employees' Retirement System, the Michigan State Police Retirement System, and the Michigan Judges Retirement System (collectively, "Lead Plaintiff"), will move this Court, before the Honorable Laura Taylor Swain, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for entry of an order, pursuant to Fed. R. Civ. P. 23(a), 23(b)(3), and 23(g): (1) certifying a class (the "Class") consisting of all persons or entities, other than Defendants and their affiliates, who purchased American International Group, Inc. common stock, preferred stock and other securities that traded on a U.S. public exchange from March 16, 2006 through September 16, 2008, including all persons or entities who, during the Class Period, purchased AIG common stock, preferred stock and other securities in or traceable to a public offering by AIG, and suffered damages as a result; (2) certifying Lead Plaintiff and additional named plaintiffs Maine Public Employees Retirement System, Port Authority of Allegheny County Retirement and Disability Allowance Plan for Employees Represented by Local 85 of the Amalgamated Transit

Union, Epstein Real Estate Advisory, Michael Conte, and Randy Lewis Decker as representatives of the Class; and (3) appointing Barrack, Rodos & Bacine and The Miller Law Firm, P.C., as Class Counsel.

**PLEASE TAKE FURTHER NOTICE** that papers in response to this motion or any portion thereof must be filed and served on or before May 24, 2012, and reply papers in further support of this motion must be filed and served on or before June 22, 2012.

Pursuant to Rule 2.b. of Judge Swain's Individual Rules of Practice, counsel for Lead Plaintiff certifies that they have used their best efforts to resolve informally with counsel for Defendants the matters raised in the present Motion for Class Certification. However, the attempts have been unsuccessful.

Dated: March 30, 2012

Respectfully submitted,

**BARRACK, RODOS & BACINE**

**THE MILLER LAW FIRM, P.C.**

/s/ Jeffrey W. Golan  
Leonard Barrack  
Jeffrey W. Golan (*pro hac vice*)  
Robert A. Hoffman  
Chad A. Carder  
Lisa M. Lamb  
3300 Two Commerce Square  
2001 Market Street  
Philadelphia, PA 19103  
Tel.: (215) 963-0600

/s/ E. Powell Miller  
E. Powell Miller (*pro hac vice*)  
Marc L. Newman (*pro hac vice*)  
Courtney Ciullo  
Casey A. Fry  
Miller Building  
950 West University Drive, Suite 300  
Rochester, MI 48307  
Tel.: (248) 841-2200

and

A. Arnold Gershon (AG – 3809)  
Michael Toomey (MT-6688)  
425 Park Avenue, Suite 3100  
New York, New York 10022  
Tel.: (212) 688-0782

*Attorneys for Lead Plaintiff, State of Michigan Retirement Systems,  
and Lead Counsel for the Putative Class*